

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: CAROLE ANN POOLER

) Case No. 16 B 02859  
)  
Debtor ) Chapter 13  
)  
) Judge: JACQUELINE P COX

**NOTICE OF MOTION**

CAROLE ANN POOLER

SULAIMAN LAW GROUP LTD  
via Clerk's ECF noticing procedures

4942 N. WASHTENAW  
CHICAGO, IL 60625

Please take notice that on May 06, 2019 at 9:00 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on April 10, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO MAKE PLAN PAYMENTS**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On January 29, 2016 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on March 28, 2016.

A summary of the debtor's plan follows:

Monthly Payment \$3,435.00

Last Payment Received: 04/01/2019

Amount Paid \$123,660.00

Amount Delinquent \$6,870.00

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to the term of a confirmed plan, pursuant to § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn